UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

        Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT, LLC
and PUTNAM RETAIL MANAGEMENT
LIMITED PARTNERSHIP,

        Defendants.

Civil Action No. 04-10988 (GAO)

PLAINTIFFS' MOTION TO ENLARGE DEPOSITION LIMIT

Plaintiffs respectfully move the Court for an order enlarging Plaintiffs' deposition limit,

which is currently 20, to allow Plaintiffs to take up to an additional 7 depositions. The grounds

for this Motion are set forth in the accompanying Memorandum.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), Plaintiffs respectfully request a hearing on the within

motion.

Respectfully submitted,

Dated: January 12, 2007

/s/ Lisa A. Furnald
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CERTIFICATION UNDER LOCAL RULES 7.1(a)(2)

I hereby certify that Plaintiffs' counsel has conferred with counsel for Defendants and have attempted in good faith to resolve or narrow the issues raised by the within motion.

Dated: January 12, 2007   /s/ Lisa A. Furnald
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CERTIFICATE OF SERVICE

I hereby certify that on the January 12, 2007, a true copy of this document was served electronically through the ECF System and by first class mail, postage prepaid, to those counsel of record indicated as non-registered ECF participants.

                                            /s/ Lisa A. Furnald
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